December 1, 2005
Electronic Filing Via ECFS

Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743
Attention: Office of the Secretary

RE: E-911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196; IP Enabled Services, WC Docket No. 05-196

Dear Ms. Dortch:

Submitted herewith on behalf of Nevada Utilities is a compliance report on the status of its implementation of E-911 service, as required by the First Report and Order in the above-captioned proceedings, FCC 05-116, 20 FCC Rcd 10245 (released June 3, 2005) ("*Order*"); Public Notice, "Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters", WC Docket Nos. 04-36, 05-196, DA 05-2945 (released Nov. 7, 2005) ("*Public Notice*").

Any questions you may have regarding this filing may be directed to me at (407) 740-3006, or croesel@tminc.com.

Sincerely,

Carey Roesel
Consultant to Nevada Utilities

cc: Byron McCoy – FCC
Kathy Berthot – FCC
Janice Myles - FCC
B. Jankovics - Nevada Utilities
file: NYCT - FCC E911
tms: FCCv0507

Compliance Report

Background

Is a regional telecommunications and internet services provider serving business and residential customers within the state of Nevada. Our VoIP service requires a broadband connection and an Analog Telephone Adaptor (ATA) device. Users of this service can originate calls to the PSTN and receive calls from the PSTN. Nevada provides E-911 capability with this service only at the end user's registered location.

1. 911 Solution

911 Routing:

Nevada Utilities provides 911 services to its VoIP customers in the same manner 911 services are provided to customers subscribing to traditional voice services. An IP Softswitch is located in carrier class central office facility. Should a customer dial 911, the IP Softswitch will route the call to redundant PSTN connected gateways. From those gateways, the call will be transmitted over traditional PSTN switching infrastructure. Based on the calling number, the PSTN switch will route the 911 call over the correct trunk to the appropriate selective router maintained by Sprint. The selective router then will route the call to the appropriate PSAP serving the customer's registered location.

Nevada Utilities also maintains its own E911 ALI database which contains the location information for all customers. Changes to information contained in the E911 ALI database are communicated daily to Sprint.

Nevada Utilities maintains fully redundant, diverse path DS1s for connectivity to the selective routers. Nevada Utilities currently provides E911 call completion with the caller's correct ANI with the Automatic Location Identification database accurately reflecting the Registered Location for 100% of its customers. Nevada Utilities provides address validation prior to populating information in the E911 database via the Master Street Address Guide (MSAG). Nevada Utilities only provides Voice over IP services in locations where Nevada Utilities can provide E911 call completion in the manner identified above. Requests for VoIP services outside of Nevada Utilities' local voice service footprint are denied.

Transmission of ANI and Registered Information:

Nevada Utilities routes all 911 calls through the use of ANI via the dedicated wireline E911 network in Nevada. 100% of answering points within Nevada Utilities' local service area in Nevada are capable of receiving and processing ANI and Registered Location. 100% of Nevada Utilities' VoIP subscribers have their ANI and Registered Location transmitted to answering points that are capable of receiving and processing this information. 0% of Nevada

Utilities' VOIP subscribers are located in an area where Nevada Utilities is not transmitting the ANI and Registered Location on a 911 call to answering points that are capable of receiving this information.

911 Coverage:

Nevada Utilities' local service footprint in Nevada is comprised of Las Vegas, North Las Vegas, and Henderson

2. Obtaining Initial Registered Location Information

Nevada Utilities reports that all of its existing subscribers for VoIP service were required to provide registered location information prior to service turn-up, and will continue this practice for all new customers. Nevada Utilities has always been able to offer 911 service, and required 100 % of its customers to provide registered location information.

3. Obtaining Updated Registered Location Information

Nevada Utilities allows end users to update their registered location by calling customer service and having a customer service representative enter the new location information. The new location is validated against the MSAG and sent to Sprint using the same methods and procedures as updating a standard POTS line.

4. Technical Solution for Nomadic Subscribers

All Nevada Utilities VoIP customers sign a detailed letter describing its 911 capabilities and limitations regarding E911 service. By agreeing to the terms of this letter, Nevada Utilities customers agree not to move their service outside of the Nevada Utilities local service footprint. Nevada Utilities has researched the requirements for E911 call completion outside of it's local service footprint, but has found it to be cost prohibitive to provide nationwide E911 call completion for what is marketed as a Nevada service. Further, Nevada Utilities believes that AT&T's proposed solution is not a practical one for customers because it would cause multiple service interruptions for situations such as power failures and simply unplugging and rearranging a home PC and ATA equipment. Such interruptions pose a high administrative cost to Nevada Utilities, and would be a disservice to customers that cannot make calls. Instead of ensuring that 911 service is available, this solution only ensures that a call cannot be made.